

June 12, 2013

Office of Environmental Information (Mail Code: 28221T)

Docket #EPA-HQ-ORD-2013-0189

U.S. Environmental Protection Agency 1200 Pennsylvania Ave., N.W.

Washington, DC 20460

Dear Acting Administrator Perciasepe,

The attached list of sport fishing and hunting organizations and businesses, representing millions of hunters and anglers across the country, are writing to comment on the Environmental Protection Agency (EPA) revised draft of the Bristol Bay Watershed Assessment. This watershed assessment accurately demonstrates what the sporting community has long believed – allowing large scale mining in the Bristol Bay region will greatly and irreparably damage one of the world's best hunting and fishing destinations. The EPA should move forward -- with the documented science in hand-- to protect this area under section 404(c) of the Clean Water Act.

The EPA relied on sound science to create this assessment, and carefully considered the input from the peer review of the previous draft. The assessment shows that this is one of the world's best remaining salmon fisheries, which at an average run of 37.5 million fish, constitutes 46% of the world's sockeye salmon. In addition to the importance of the sockeye salmon, the updated assessment better details the impacts to Chinook salmon, rainbow trout, and char, all of which are prized sport fish that result in more than 29,000 fishing trips per year. The area is not only known for its fishery, and also supports high densities of water fowl, ptarmigan, brown bear, moose, and caribou which attract hunters from around the world.

Sportfishing, hunting, and eco-tourism alone generate more than \$160 million in local economic activity, creating nearly 2500 local, sustainable jobs. This economic driver depends on the unparalleled habitat of the Bristol Bay ecosystem, which is jeopardized by large scale mining development. Even without any failures, leaching of copper, stream acidification, and dredge and fill activities would impact dozens of miles of streams. Copper leaching alone could directly impact up to 35 miles of river beyond the mine site, and indirectly impact 51 stream miles. All of this assumes a best case scenario where the mine tailings, which must be treated in perpetuity, are successfully

contained in an area known for its seismic activity. The waste stream from this mine will inevitably damage the salmon and the ecosystem for which they are a keystone species. Of course, any of a multitude of problems can and likely will occur, ranging from small to large, which will only increase the negative impacts on Bristol Bay's lands, waters, fish, game, and the economy dependent upon them.

The watershed assessment clearly demonstrates the significant value Bristol Bay provides to hunters and anglers across the country, and suggests it should be protected so that it may be enjoyed by future generations of sportsmen. The attached list of sport fishing and hunting organizations and businesses urge the EPA to move forward with a 404(c) determination under the Clean Water Act, allowing the agency to institute restrictions on mining activities that would threaten this incredible ecosystem, while allowing reasonable development to proceed.

Thank you for the opportunity to submit these comments and for your consideration of them as your agency moves forward in determining the future of Bristol Bay.

Scott Hed Director Sportsman's Alliance for Alaska